Municipal Regulation of Elections.—The regulation of elections within the charter of Haverhill was assailed in Graham *v.* Roberts, 85 Northeastern Reporter, 1009. It provides for a preliminary election for nominations for office, prohibits the use on the official ballot of the name of a candidate named by nomination papers or by caucus, forbids the use of a statement of the candidate's party, and requires that 25 voters shall request that a candidate's name be put on the ballot before it shall be placed there. While the Supreme Court of Massachusetts declared this a radical departure from the general methods of municipal government, and doubted that the people who adopted it would be satisfied with it, yet it held that it was a valid regulation of the election of municipal officers.

Can Legislators Increase Their Salary.—A case of particular interest to members of Legislatures appears in State ex rel. Olson *v.* Scott, 117 Northwestern Reporter, 1044. The principal question is whether a law increasing the salaries of members of a Legislature disqualifies those members from being eligible as candidates to succeed themselves. The Minnesota Const. art. 4. § 9, declares that no Senator or Representative shall during his term hold any office, under the authority of the United States or the state, except that of postmaster, nor any office under the state which has been created, or the emoluments of which have been increased, during the session of the Legislature of which he was a member, until one year after the expiration of his term of office. Section 7 provides that compensation of Senators and Representatives may be prescribed by law, but no increase shall be prescribed which shall take effect during the period for which the members of the existing House may have been elected. Construing these provisions, the Supreme Court of Minnesota finds no difficulty in declaring that the Legislature may increase the compensation of its members at any time, with the single exception that the increase cannot take effect during the session. The members of any Legislature may increase their compensation to take effect at the succeeding session.

Taft Monogram as a Copyright.—During the recent campaign the equitable jurisdiction of a federal court was invoked in Royal Sales Co. *v.* Gaynor, 164 Federal Reporter, 207, to restrain the infringement of a copyright in selling a Taft monogram. Defendant had copyrighted a book describing the monogram used on a campaign badge, which was sold pinned to the book. The copyright was assigned, and subsequently defendant copyrighted another booklet which he sold with a similar monogram badge pinned to it. The monogram was described, as containing the initials of President Roosevelt; the cross, the emblem of Christianity; the mystical number 7; and the important

words "You" and "I." The court holds that the monogram was not a subject within the copyright law. It was not a cut, print, or engraving, because it was not a pictorial illustration connected with the fine arts. The case would be the same, if the copyrighted book contained a cut of an ordinary coffee mill or kitchen range. It would be no infringement to reproduce the cut or actually to make the article.

Burning of Dwelling House of Wife by Husband.—The common-law offense of arson, which is much like that of Wisconsin, consists of feloniously burning the dwelling house of another. The domicile of accused having suffered a great dearth of domestic tranquility, his wife began a divorce action, secured a deed from him to the house, and dwelt alone therein. Thereafter he applied a brand to the structure. In Kopcynski *v.* State, 118 Northwestern Reporter, 863, it is held that a husband, living with his wife in a dwelling house which she owns and they both occupy, is not capable of committing the crime of arson by burning it. The Supreme Court of Wisconsin adds, however, that a married man can commit the crime by burning the home of his wife with whom he is not living and from which he had been excluded, or excluded himself, and the question of in whom the title to the property rests is immaterial.

Not Reversible Error for Court to Smile.—During the course of the trial the defendant requested the court to have one Ananias Godwin sworn and put under the rule, whereupon the court smiled. Defendant noted an exception to the smile and expression. Ananias was not tendered as a witness, nor does it appear what testimony it was intended to elicit. In Bellamy *v.* State, 47 Southern Reporter, 868, the Supreme Court of Florida remarked that it was impossible to place itself in a position to intelligently consider the harmful effect, if any, of this slight lapse from the severe judicial decorum had Ananias been before the jury as a witness. It is reasonably certain, however, that had he been presented to the jury, the biblical forbear of the name would speedily have been brought to the attention of any juror so ignorant as to be unaware of it, and that the smile was natural, even if not justified or excusable.

Can a Cow Give Adulterated Milk?—One Bosch was prosecuted for vending adulterated milk. The Agricultural Law expresses the necessary quantity of milk solids to relieve milk of the stigma of adulteration. In People *v.* Bosch, 114 New York Supplement, 65, the New York Supreme Court decided that if the milk came within the provisions of the statute it was adulterated, and that the mere fact that it was sold in precisely the same form as it was drawn from the cow was no defense.